

MMG

McMAHON, MARTINE & GALLAGHER, LLP
ATTORNEYS AT LAW

Principal Office:
55 WASHINGTON ST.
BROOKLYN, NY 11201
TEL (212) 747-1230
FAX (212) 747-1239

New Jersey Office:
404 MARKET STREET
TRENTON, NJ 08611
TEL (609) 396-2999
FAX (609) 396-2254

June 27, 2014

The Honorable Roanne L. Mann
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Oceana Condominium No. One et al. v. Fugate et al.
Docket No. 1:14-cv-02535-FB-RLM
Our File 628.0165

Dear Judge Mann:

We represent defendants Fidelity National Property and Casualty Insurance Company, Fidelity National Property and Casualty Insurance Company d/b/a Wright National Flood Insurance Company, and Wright National Flood Insurance Company in the above-referenced matter. We write respectfully to seek an extension of time through and including August 16, 2014 to respond to the Complaint in the referenced matter. In the absence of an extension our time to answer is July 2, 2014. We seek an extension in order both to best prepare an Answer to the Complaint after a review of all available information, and also to facilitate ongoing efforts to resolve the claims underlying this lawsuit. There has been no previous request for an extension. Plaintiff's counsel has graciously consented to this application, and a stipulation to that effect accompanies this letter motion.

Thanking Your Honor for your attention, I remain,

Respectfully yours,

/s/ Patrick W. Brophy

Patrick W. Brophy

cc: All counsel via ECF
J:\628\0165\Letters\Court_06-27-14.docx